

EXHIBIT 56

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK I. SOKOLOW, et al.,

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PLAINTIFFS,

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-against-

Case No:
04CV397 (GBD) (RLE)

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THE PALESTINE LIBERATION ORGANIZATION, et
al.,

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DEFENDANTS.

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DATE: October 14, 2012

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TIME: 1:40 P.M.

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DEPOSITION of SHIFRA GOLDBERG,

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taken by the Defendants, pursuant to Notice

17

and to the Federal Rules of Civil

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Procedure, held at the offices of Morrison

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& Foerster, 1290 Avenue of the Americas,

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New York, New York 10104, before Robert X.

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Shaw, CSR, a Notary Public of the State of

22

New York.

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25

1 Shifra Goldberg

2 English name was Stuart Scott.

3 Q. Okay. And I understand you had
4 a nickname for him?

5 A. Um, no. Not me. I called him
6 Yechezkel. Other people might have called
7 him Chesi.

8 Q. Okay. And those were the only
9 names that you might have used to refer to
10 him? Did he have any other names?

11 A. Scotty.

12 Q. Okay. And what was his
13 nationality?

14 A. Canadian.

15 Q. And what is your nationality?

16 A. American.

17 Q. Okay.

18 A. And Israeli.

19 Q. Are you an Israeli citizen?

20 A. Yes.

21 Q. And was he an Israeli citizen?

22 A. Yes.

23 Q. Okay. And where was
24 Mr. Goldberg born?

25 A. Um, in Canada.

1 Shifra Goldberg

2 during college?

3 A. In an office.

4 Q. In an office? And what were
5 you doing?

6 A. I don't remember really.

7 Q. Office work?

8 A. Office work, yes.

9 Q. Okay. And so, you moved to
10 Israel in '93 and you lived in Beit
11 Shemesh. And how long were you in Beit
12 Shemesh?

13 A. Nine months.

14 Q. Okay. And then, where did you
15 did you move after that?

16 A. In Har Nof, in Israel.

17 Q. And how long were you in Har
18 Nof?

19 A. About four or five years,
20 something like that.

21 Q. Okay. And then, after Har Nof,
22 where did you move?

23 A. To Beitar Illit.

24 Q. To Beitar Illit. So, how long
25 have you lived in Beitar Illit?

1 Shifra Goldberg

2 A. I think it worked out to about
3 14 years.

4 Q. Okay. And have you --
5 What made you move to Beitar
6 Illit?

7 A. A nice religious community,
8 and the housing was cheaper than in Har
9 Nof.

10 Q. And how large is the community
11 in Beitar Illit?

12 A. About 55,000 people.

13 Q. Okay. Mrs. Goldberg, have you
14 heard of Beitar Illit referred to as a
15 settlement?

16 A. It's a city.

17 Q. Okay. But have you heard it
18 referred to as a settlement?

19 MR. SOLOMON: Note my
20 objection.

21 Go ahead. You can answer. Yes
22 or No.

23 A. Um -- no, I haven't really
24 thought about it.

25 Q. Okay. But regardless, have you

1 Shifra Goldberg

2 just heard of it -- personally, have you
3 heard people refer to it as a settlement?

4 A. I heard, I mean -- I heard of
5 it, but, um, I guess the answer would be
6 "Yes."

7 Q. Okay. And in your
8 understanding -- you're hesitating to say
9 "Yes," so --

10 A. Because I've only heard of it
11 in the context of this -- um --

12 Q. In the context of a lawsuit, do
13 you mean?

14 MR. SOLOMON: When is the first
15 time that you heard of it mentioned
16 as a settlement?

17 THE WITNESS: In the last
18 deposition.

19 Q. Okay. So, what's your --

20 So, the first time you heard of
21 it referred to as a settlement is in the
22 last deposition, the first deposition that
23 you've had. What's your understanding of a
24 settlement?

25 MR. SOLOMON: I think we should

1 Shifra Goldberg

2 be clear, by counsel, we're referring
3 to my client's deposition in the Arab
4 Bank litigation.

5 Go ahead.

6 A. In my definition, it's a place
7 where people settle.

8 Q. Okay. But are you aware,
9 Mrs. Goldberg, that there is some
10 controversy regarding the location of
11 settlements in the West Bank?

12 MR. SOLOMON: Objection.

13 Go ahead.

14 A. I'll be honest with you, I'm
15 not involved in politics.

16 Q. Okay. But just as a factual
17 matter, are you aware that there's some
18 controversy regarding the existence of
19 settlements in the West Bank?

20 A. I'm aware.

21 Q. Okay. And do you refer to the
22 area as the West Bank?

23 A. Not at all.

24 Q. Okay. And how do you refer to
25 your area?

1 Shifra Goldberg

2 not -- I don't remember how I found out.

3 I don't remember, I don't even
4 know if it was until years later that I
5 found out.

6 Q. Okay. Mrs. Goldberg, I'm sorry
7 I'm going to have to ask you this, but did
8 you see your husband's body after the
9 attack?

10 A. No. I chose not to.

11 Q. Okay. Did somebody else
12 identify him?

13 A. Yes.

14 Q. And who was that?

15 A. Um, I don't remember the name.

16 MR. SOLOMON: It's okay.

17 A. I don't remember the name.

18 Q. You don't remember the name?
19 Was it a relative?

20 A. No. We didn't have any
21 relatives there.

22 Q. Okay. Well, would that person
23 have been able to positively identify your
24 husband?

25 A. Yes.

1 Shifra Goldberg

2 A. No.

3 MR. SOLOMON: Verbal.

4 A. No.

5 Q. Do you think the Arab Bank
6 caused the bombing that took place on
7 January, 2004?

8 MR. SOLOMON: Objection.

9 A. I'm relying on my lawyers for
10 all that.

11 Q. So, you don't have any personal
12 knowledge --

13 MR. SOLOMON: Asked and
14 answered.

15 Go ahead.

16 Q. -- as to who caused the
17 bombing?

18 MR. SOLOMON: That was not
19 asked and answered; so, you can
20 answer that question.

21 Q. Let me ask it again.

22 So, you don't have any personal
23 knowledge as to who caused the bombing in
24 January of 2004?

25 A. No.

1 Shifra Goldberg

2 Q. Okay. Are you seeking
3 compensation for the same injuries in this
4 case as you are in the Arab Bank case?

5 A. I'm relying on my lawyers for
6 all this. I don't have the head to deal
7 with it.

8 Q. Okay. But you're not saying
9 that you suffered different injuries in the
10 Arab Bank case than you're saying in this
11 case?

12 A. No.

13 Q. One set of injuries that you've
14 suffered?

15 A. Yes.

16 Q. Why did you sue the PA?

17 A. Um, the same reason. I heard
18 that, um, they're connected with the
19 attack.

20 Q. Okay. And why did you sue the
21 PLO?

22 A. Um, I'm relying on my lawyers
23 for all this kind of stuff. I really --

24 Q. So, for the --

25 I just -- I understand. I just

1 Shifra Goldberg

2 want to get it on the record. So, we'll
3 just go through each one and we'll just get
4 that on the record.

5 So, again, you sued the PLO, as
6 I understand, because you understood that
7 they were alleged to have been involved in
8 this attack?

9 A. Yes.

10 Q. And it's correct to say that
11 you don't have any personal knowledge about
12 those allegations?

13 A. Right.

14 Q. And is it correct to say that
15 your attorneys have conducted the
16 investigations related to anything that may
17 have happened on that day?

18 A. Yes.

19 Q. How did you come to be involved
20 in the case against the Palestinian
21 Authority and the PLO?

22 A. I don't remember exactly how.

23 Q. Did you reach out to a lawyer?

24 A. Um, I don't remember how it
25 happened, because everything was -- I don't